

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHER DISTRICT OF ILLINOIS
EASTERN DIVISION**

Alvin Fields, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:07-cv-6894
)	Judge Joan H. Lefkow
Lyon Workspace Products, LLC, et al.,)	
)	
Defendants.)	Jury Trial Demanded

**AGREED MOTION TO EXTEND THE TIME
FOR ANSWERING DEFENDANTS' COUNTERCLAIM**

Plaintiffs hereby file this agreed motion to extend the time for Plaintiffs to answer or otherwise plead to Defendants' counterclaim in this case. These are the reasons for the motion:

1. The Plaintiffs allege that the Defendants illegally altered the retiree health benefits they received pursuant to a collective bargaining agreement. They have brought this suit under the Employee Retirement Income Security Act (ERISA) and the Labor Management Relations Act (LMRA). Defendants have counterclaimed.

2. Plaintiffs have asked Defendants to withdraw their counterclaim. Defendants' counsel has agreed to take this request up with his client and that Plaintiffs' request will be given serious consideration.

3. Counsel for Defendants has indicated that consultation with his client would take until March 14, 2008.

4. Plaintiffs' response to the counterclaim is due on March 14, 2008.

5. Plaintiffs request that the time for responsive pleading to Defendants' counterclaim be extended to March 21, 2008.

6. Defendants have agreed to this request.

7. Granting this request will not delay the progress of this case nor prejudice the rights of the parties.

WHEREFORE, the Plaintiffs pray that this Court grant their request to extend the time to respond to the counterclaim to March 21, 2008.

Respectfully submitted,

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By: /s/ Stephen A. Yokich
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Attorneys for Plaintiffs

Dated: March 13, 2008

CERTIFICATE OF SERVICE

Stephen A. Yokich, an attorney, hereby certifies that on March 13, 2008, he caused the foregoing **Agreed Motion To Extend the Time for Answering Defendants' Counterclaim** to be filed electronically with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Mark E. Schmidtke, Esq.
Eric P. Mathisen, Esq.
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and further certifies that on March 13, 2008, he caused the same document to be served upon the following nonregistered participants by U.S. Mail, first-class postage prepaid and addressed as shown below:

A. Craig Cleland, Esq.
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